

INTERVIEW WITH

J. GRAHAM SULLIVAN

DEPUTY COMMISSIONER OF EDUCATION

by Mrs. Monna Clark

Office of Education

July 22, 1968

Interview of Deputy Commissioner J. Graham Sullivan by Mrs. Monna Clark
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MRS. CLARK: In preparing our history of the Office of Education we are interviewing Mr. J. Graham Sullivan, who has served as Deputy Commissioner of Education since July 1966.

MR. SULLIVAN: As I present my remarks, probably I will be shifting hats from time to time, for I will be reporting reactions as a local education agency officer working with the Office of Education, as a State Department of Education officer and, more recently, as an official of the U.S. Office of Education.

From time to time my points of view have changed, depending upon the role I have played. First, I believe there is no question that during the Johnson Administration, the Administration, the Congress, and the people recognized for the first time that education was a major instrument for economic growth and social progress.

I believe also there is no question that various pieces of legislation introduced by this Administration and passed by Congress have had major impact on the school systems, both public and private--at all levels--including universities and colleges.

It is difficult for us to determine at this stage how much of an impact it has had for, after all, we are talking largely about the period from 1965 until 1968 and education change is slow, at best. We have not found the effective instrument to really evaluate those specific parts of the legislation which have resulted in change and those specific parts which

have had little impact. Only time will tell how effective various activities carried on through Federal legislation have been.

There is no doubt that it has brought about an attitude throughout the entire educational community that change is essential; that in order to bring about change you must get the educational community excited about it as well as segments of our society.

MRS. CLARK: In line with evaluation, Mr. Sullivan, do you think the Office is better prepared now to evaluate Federal programs, than, say, we have been in the past for NDEA programs?

MR. SULLIVAN: I am not sure that we are--in some respects, we are better off and in some respects we are not: First, time is an important factor and with each year we will be able to evaluate more accurately what really has happened; secondly, we have had time to engage in some significant research which has enabled us to do some evaluation; thirdly, we have had time to develop more effective instruments to evaluate what has happened; and fourthly, we have had time to train personnel to carry on the evaluation activity.

In all our endeavors in education, I believe that our weakest point is our inability to evaluate what is happening. It is largely because we have not learned proper evaluation techniques, nor do we have personnel trained to do the evaluation job.

Henceforth, with our new techniques and with our newly trained personnel, we have the resources to evaluate our programs. Therefore,

we are going to be able to do a more effective job in determining those things which have worked and those things which have not worked. By doing so, we can provide alternatives to school districts and institutions of higher education to make choices on the basis of some pretty hard data which has not been available to us prior to this time.

We have some attitudes which tend to oppose the efforts on the part of the Office of Education in carrying on an effective evaluation program, particularly as we refer to anything that is named a National assessment or a National sampling.

In my State, for example, when we talked about statewide testing, we had the same attitudes opposing statewide testing. Presently we have the opposition of chief State school officers to any National sampling or evaluation program or a National assessment of education. I am not quite certain what causes this opposition, but I must be very candid and say that I am of the opinion that it is primarily the fear of comparison of one local community to another, or to one State to another. There is some validity to this fear of comparison if the evaluation does not consider all the factors relating to student achievement.

For example: The nature of the community, the percentage of minority groups in a community, the resources of a community, and many added factors enter into an evaluation program that sometimes are not considered when you interpret the results of an evaluation program.

Looking back, I am inclined to identify fiscal year 1965 and fiscal year 1966 as the years of hopes and high expectations and identify fiscal

years 1967 and 1968 as the years of frustration and, maybe at this point, discouragement. What I am really saying is that the legislation for the Elementary and Secondary Education Act, the new Vocational Education Act of 1963, the expansion in research funds, and various new legislation in higher education, all built up high hopes and expectations on the part of all of us. As a result of the necessity attributable largely to the Vietnam War, the levels of funding have been such that these expectations have not been able to be fulfilled.

Until such time as we, as a nation, place high priority on what I believe we have identified as necessary education, we are not going to solve the critical problems which face us now. For example: In the inner city the education of the minorities and the many other major problems of our entire society are going to be dependent upon not only placing high priority on education, but on providing adequate funding in a way that will enable us to develop long-term plans, and support and implement long-term plans.

This reference to long-term plans leads me into another discussion about one of the critical problems--again wearing all three hats. I realized as a local educational officer, a State officer, and as a Federal officer, it must be resolved if we are going to use whatever resources are made available to us wisely. I refer to the need for long-term legislative action on the part of Congress. I also refer to the policy providing advance funding through the appropriation process by Congress, for one of the most critical problems facing the local educational agencies, State departments of education and institutions of higher education is

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the uncertainty with reference to authorizing legislation and to the appropriations.

Presently it is necessary for educational agencies to wait sometimes until the academic year is more than half complete before they actually know what funds are going to be available to them.

Our action at the Federal level in no way ties into the budget planning cycle of local educational agencies. Hence, there is hesitancy in moving ahead with new plans and expanding old programs until such time as they know what resources are available to them.

Congress had before it this year a proposal that would have provided for long-term authorization, a minimum of five years, and advance funding of programs in education. This proposal was unsuccessful in this Congress with one exception: Congress did approve advance funding for Title I of the ESEA. It was originally stricken from the legislation in the House and was, through Committee action, put back in through floor action amending the action of the Committee.

But if I were to identify one single problem that must be resolved it is the above--we must provide opportunities for planning, with advance funding to assure a level of support, for new activities developed under various pieces of legislation.

MRS. CLARK; Why do you think there is so much opposition to this in Congress?

MR. SULLIVAN: I think there are several reasons for it: Congress is hesitant to commit a future Congress on any appropriation action; such a

plan does take away from the Appropriation Committee, through the legislative committee, certain prerogatives which they feel are theirs and, actually, I feel it is simply that Congress still does not realize how important it is that we provide for long-term legislation and advance funding.

The people have not called out loud enough, saying, "this must be." I anticipate that before long some action of this kind will be taken on a broader base than Title I.

There are a lot of technical, and I guess some constitutional questions relating to this--it isn't simple. And yet, the plan and the proposal developed by the committee on which I served, chaired by Jim Kelly, did not include anything that has not already been established in some parts of government as a precedent.

There has never been any single package, but every piece of this proposal has precedent in some other legislation and appropriation action taken by Congress.

MRS. CLARK: Was this proposal supported by State and local educators or were they--

MR. SULLIVAN: Yes, it was supported by State and local educational leaders and by many members of Congress who have responded favorably, but it got caught up in the Congressional machine and only a small part of it has actually come to be a reality.

(INTERRUPTION IN TAPE)

MR. SULLIVAN: A question worthy of making some comments has to do with the relationships of the Federal government and the State governments and the local educational agencies as this relates, both directly and indirectly, to the question of general aid or categorical aid. As we know, Congress has seen fit, over the past 100 or 110 years, to pass legislation (the original was the Morrill Land Grant Act of 1862) for specific purposes, we have called it "categorical" and has been unwilling, in any major way, to provide general aid.

The closest thing we have to general aid is Public Law 874 and 815 which we refer to as the Impacted Areas legislation. The Federal government, I assume, has felt that the best way to provide assistance to bringing about significant change in education, was to identify specific areas of concern that were of national interest and then provide funds that served as a catalyst, as a stimulus to local agencies and State departments of education.

The Vocational Education legislation of 1917 is a good illustration. The original act and all the Vocational Education Acts that followed--the NDEA Act of 1958, the Elementary and Secondary Education Act, all the higher education acts, and the Vocational Ed Act of 1963 and so on, are all for specific purposes.

Although most of these do contain clauses that specify that there shall be no Federal control, Federal intervention, or Federal influence on education, the very nature of the legislation itself provides control and influences and intervenes; specifying the specific purposes, and requiring that the

Office of Education protect the integrity of the legislation to see to it that the intent Congress had for the legislation is maintained. This leads to guidelines and regulations too often spelled out in too much detail and specificity by the Office of Education itself.

The time will come, in my judgment, in the not too distant future when there will be some broad programs of general aid. And by general aid we mean State grants--or block grants given to States and institutions of higher education for general purposes to be used by those institutions in whatever way they see fit in order to promote the interests of education. When this happens, it doesn't mean that we will discontinue what we refer to as "categorical aid" or there will continue to be a need in specialized areas; for example, right now, to meet the problems of the inner city, to meet the problems of the minority groups and many others where we will continue to have a need for categorical aid.

All of the programs which I have referred to with their guidelines and their regulations have developed some tensions in some cases, between the State departments of education and local educational agencies.

The Office of Education has taken a very positive posture with reference to this relationship. We have identified our role as that of a junior partner. We have identified the State as the agency of government responsible for education and we have identified the local educational agencies as the ones responsible for the programs of education within whatever framework the States set up.

As evidence of some of the tensions which have built up, as a result of the efforts of the Federal government, we moved ahead about a year ago to implement the mandate from both the President and from the Secretary to strengthen the regional offices of the Office of Education and to transfer much of the administrative responsibility or programs to the field for purposes of efficiency. Much opposition occurred immediately from the chief State school officers feeling that this was bypassing the States and feeling rather that the States should become the arm of the Federal government and that we should use the States for these functions rather than establish regional offices.

Our position has been that we do have a responsibility of doing everything we can to strengthen the hand of the States departments of education and specific legislation has been passed for this purpose.

I believe, as we think back over the past few years about the relationships between the agencies, the concerns which the States have, and also the local educational agencies and institution of higher education, our respective roles and relationships have had more to do with the timetable for passing legislation and the lack of advance funding and the nature of the guidelines and regulations than with reference to any prerogatives which we overtly are attempting to take from the States and local educational agencies.

I believe that under the leadership of Commissioner Howe and with the advice and wise counsel of Wayne Reed we have been able to improve those relationships and in general, I think, we could say as of the moment that they are extremely

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healthy. We still have some problems, but I am optimistic that with time these problems can be solved.

(INTERRUPTION IN TAPE)

MR. SULLIVAN: With reference to regionalization, we have had opposition from Congress. I think this opposition comes as a result of two things: One, the political activities of the chief State school officers. As a matter of fact, the political activities of the six major educational associations, including the chief State school officers, the Parent-Teachers Association, National School Boards Association, State School Boards Association, the National Education Association, and I may have left out one or two.

Members of Congress, just recently, took a stand through action in the higher education legislation pending in Congress, opposing the action which we had taken in the Office of Education to package some of our programs and to encourage comprehensive planning at State and local levels.

The rationale, for this action is the fear which some have that the Office of Education, by taking such initiative, is really over-managing the use of funds, thereby limiting the options to the States and the local educational agencies as to how the funds are to be used.

Secondly, and this certainly is second, they feel that by encouraging comprehensive planning, and comingling of funds in specific projects, that we are destroying the identity and the integrity of individual pieces of legislation. There are political reasons why they have objections to this.

If we follow this approach it becomes very difficult for any specific congressman or senator to say this happened as a result of my piece of legislation. In this approach, it happened because of several pieces of legislation where funds are comingled, pieces of a project or program are financed under the authority of one piece of legislation and then by another part of it under another piece of legislation and, so on.

The local educational agencies are even more concerned about over-management of funds that go to the State and are available to local educational agencies.

Again, as I look ahead, the day is going to come when instead of having 75 to 80 different pieces of legislation, all of which complicates the administrative problems, and tends to decrease the wise use of funds, we will have consolidation of a lot of this legislation into one package.

An illustration of this is what happened in Congress this last year when the Educational Professions Development Act was passed. It combined into one piece of legislation a whole series of training programs. The end result certainly will be more efficiency in administration, better use of funds, and more significant contribution to education. Again, I predict that we will have more and more of this but we will have to overcome some of the objections to it that I have referred to earlier.

MRS. CLARK: You have mentioned some of the external problems in connection with packaging. I know that you are sort of the pivot point for the North Dakota and Texas comprehensive plans. Could you describe any internal problems you encountered in those two exercises and how would you assess those efforts?

MR. SULLIVAN: I have referred to the external opposition and the problems relating to the consolidation and packaging of programs and comprehensive planning. I would be less than truthful if I did not say that we had some significant internal problems. As we, for example, attempted to work with the State of Texas and North Dakota and some other States in our packaging and comprehensive planning enterprise, we found that more than one bureau within the Office of Education became involved. This leads me to suggest something that I will talk about in just a minute. Our administrative structure in the Office of Education tends to encourage the development of a series of autonomous, independent units. We haven't been able, as yet, to provide the effective lanes of communication and the effective structure to see to it that these units carry on a total, coordinated effort, directed toward major missions of the Office of Education. But more of that later.

Because of the autonomy of the bureaus, the fact that each bureau with its various pieces of legislation has its own guidelines, regulations, and procedures for evaluation, there has been fear that, for example, the Bureau of Education for the Handicapped, and its programs might be submerged in a major effort where the initiative was taken by some other bureau; that if administrative funds are combined into one package and given to the State, the administrative funds made available under existing legislation for the education of the handicapped would not be used for that purpose.

Again, we believe that in time, we can work out these internal problems and I predict that it will not be long before much of our present

legislation will be rewritten so that we can focus all of the resources on the major needs identified by the educational community for education throughout the country.

What I said earlier with reference to the fact that the Office of Education still tends to be a series of autonomous, independent units, or more specifically, bureaus; unfortunately, the same prevails as you look within divisions within bureaus.

We are looking at all of this administratively and trying to identify a mechanism that will provide effective coordination and communication. We are hopeful and I say, just hopeful, because with the great variety of pieces of legislation we have, it is extremely complex and difficult to provide coordination and the pressures from the outside tend to encourage us to give visibility to the special interest group that we not pull these programs together.

MRS. CLARK: It seems to me, recently, we have been giving visibility to special problems. For instance, Mr. Smith, at the commissioners level on urban problems. I believe Mrs. Wolf is coordinator for citizen activities and of course, Dr. Goff is Office for the Disadvantaged. Do you see this chain continuing

MR. SULLIVAN: Well--

MRS. CLARK: Or perhaps why--

MR. SULLIVAN: Well, quite frankly, I hope not. We have done this largely, I think we would have to admit, for political reasons. We have followed no consistent pattern. For example, Mr. Smith is in the Office of the Commissioner, reporting directly to the Commissioner. Armando Rodriguez, of the Mexican-American unit, is in the Bureau of Elementary and

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Secondary Education reporting directly to the bureau chief.

A new unit, recently established to give greater visibility and to devote more of our resources to Indian education, was put in the Office of Programs for the Disadvantaged.

I said political reasons, but expediency also dictated some of these things, for all of these created some internal organizational problems for us. We have rationalized each one, organizationally, and in my judgment it is not sound to have them in this sort of a relationship. They are a part of, although they have identified themselves with special interest, the Mexican-Americans, the Indians, and so on.

You have to raise a question organizationally; what is the Bureau of Elementary and Secondary Education supposed to do; what is the Bureau of Vocational Education supposed to do; what is the Bureau of the Handicapped supposed to do; and what is the Bureau of Educational Personnel Development supposed?, etc.

So it has tended to create some new administrative problems for us by actions that we have taken.

You can now say that it doesn't necessarily follow just what has preceded it, but earlier I talked about evaluation and, although I said that evaluation had been limited, incomplete, certainly we didn't know as much as we should know about what works and what doesn't work. In spite of all that we do have some good data to indicate that certain things will do certain things for certain students and certain places and at certain times.

There are alternatives that can be made to local educational agencies, States, and institutions of higher education, etc., for administrators to

choose from, and the decision should be theirs to make these choices. We have failed, as yet, in the Office of Education to provide the vehicle (even if we had the vehicle, we don't have the resources) to disseminate this information about these matters. We have been attempting through legislative process and through the presidential budget to get Congress to provide funding that would enable us to mount a major enterprise in the Office of Education for dissemination.

We do much of it informally through conferences and publications. Our most significant, I guess you would call it a formal dissemination device, it what we refer to as the ERIC system. Educational Research Information Centers.

The only problem is that the information forthcoming from the centers is information in such a form that it is of primary interest to researchers, and not as usable as we would hope it might be for the average school teacher, administrator, supervisor, and so on.

As I look ahead, there is one other area I think is worth referring to, and it is the relationship between the private foundations and the Office of Education. There was a time, not too many years ago, when the role of the foundations providing funds for education was quite clear, providing risk capital.

The purpose of the risk capital was to encourage men and women in education to reach out and try ideas that had not been tested but had possibilities of running the risk of failing; (something that a local school administrator, until recently, hasn't been able to afford, to try anything that failed, and to venture into new and untried areas.)

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Then, when it was proven and tested, they could pass this on to the States-- local educational agencies and institutions of higher education.

The new legislation, particularly the Cooperative Research Act--(I said, particularly the Cooperative Research Act, but I probably mean the Cooperative Research Act is the first such piece of legislation followed by Title III of the ESEA, the new vocational education research funds, even Title I of the ESEA and some of our higher education legislation) has provided Federal funds to do the same sort of thing that the Foundations were doing. Hence, the question now is what is the new relationship and role between foundations and the Federal government?

It is my judgment that through efforts which are presently underway, this role will be clarified soon and there will be many more joint efforts, actual comingling of Federal funds and foundation funds, and educational enterprises. One of the critical legal problems that has to be resolved before this sort of relationship can come to full bloom, has to do with the conflict of interest laws. There are so many restraints and restrictions at the present time that it is difficult for this kind of relationship. And I would say unfortunate that this kind of relationship cannot come into being at the present moment.

There are a couple of problems that I haven't touched that I would like to include. One has to do with the relationships of the Office of Education to the Department of HEW.

In Representative Edith Green's subcommittee report following a study of the Office of Education, it was stated that the Office of Education

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was larger than eight of the existing cabinet offices both in size of responsibility and in funding.

It is presently approximately a \$4 billion enterprise, involving 22,000 school districts and 2,300 institutions of higher education, State departments of education, and 75 different programs. It has grown rapidly, in just a few years. The fact that the Office of Education is an agency of HEW tends to increase the bureaucracy--tends to multiply the problems which develop in a bureaucracy. The whole process of decision-making has slowed down. There is a Commissioner of Education and an Assistant Secretary for Education.

All of our fiscal matters are channeled through the controller in HEW. All administrative matters or administrative controls are placed on us by the Assistant Secretary for Administration. All legislative matters are cleared through or channeled through the Assistant Secretary for Legislation.

If the Office of Education is ever going to meet the demands that are being placed upon it in the next ten years, it has to have an independent status.

(INTERRUPTION IN TAPE)

.....The Commissioner has kept me completely on board of everything that goes on. He and I arrived at the office many times at 7:30 a.m. and, without fail, he would visit my office so that we could bring each other up-to-date and discuss issues, report the past day's activities, and go over plans for the present day.

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If he leaves the office to go to the White House, to a hearing, or the Bureau of the Budget, etc., when he returns he comes through my office to discuss issues with me; when I go out, I do the same upon my return.

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I referred earlier to the tremendous growth in the Office of Education and the many changes that have come about during the past few years. I don't recall the exact figures now, but my recollection is that in 1947 the Office of Education was responsible for administering something like \$150 million. Just prior to the National Defense Education Act, the amount had gone up to about \$700 million, and presently approximately \$4 billion.

Now during this period of time, there has been a limited increase in number of staff, but very limited in terms of the increase in responsibilities of the Office of Education. For example, we presently have on board an unauthorized ceiling for one less supergrade than was authorized in 1965 at the time of the reorganization of the Office of Education. And yet the responsibilities of the Office of Education have increased greatly during that period of time.

Congress is constantly passing new legislation, adding new responsibilities, directing new studies, and so forth, without authorizing additional personnel. New legislation has to be implemented with existing personnel. One of the most outstanding illustrations of this was the mandate by the Congress to establish a new Bureau for the Education of the Handicapped. Without any additional staffing authorized until the following year. Even then the additional staff was so limited that most of the staffing had to be provided from the existing ceilings. Again when the new Institute of International Studies was approved, this had to be staffed out of the existing ceilings.

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At the present time many new responsibilities are assigned to the Office of Education as a result of the new legislation. To be more accurate, I would say that it appears that new responsibilities will be assigned to the Office of Education as a result of legislation presently in the hopper. And new responsibilities will be transferred from other agencies to the Office of Education. If past practices are followed, there will be no additional authorization for staffing. This is an impossible situation for neither can the Office do an effective job in implementing new legislation, but existing programs suffer for the resources which have been devoted to past efforts must be reduced to meet new responsibilities.